

1 THE HONORABLE JAMAL N. WHITEHEAD  
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7 UNITED STATES DISTRICT COURT  
8 WESTERN DISTRICT OF WASHINGTON  
9 AT SEATTLE

10 PLAINTIFF PACITO; PLAINTIFF ESTHER;  
11 PLAINTIFF JOSEPHINE; PLAINTIFF SARA;  
12 PLAINTIFF ALYAS; PLAINTIFF MARCOS;  
13 PLAINTIFF AHMED; PLAINTIFF RACHEL;  
14 PLAINTIFF ALI; HIAS, INC.; CHURCH  
15 WORLD SERVICE, INC.; and LUTHERAN  
16 COMMUNITY SERVICES NORTHWEST,

17 *Plaintiffs,*

18 v.  
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20 DONALD J. TRUMP, in his official capacity as  
21 President of the United States; MARCO RUBIO,  
22 in his official capacity as Secretary of State;  
23 KRISTI NOEM, in her official capacity as  
24 Secretary of Homeland Security; ROBERT F.  
25 KENNEDY, JR., in his official capacity as  
26 Secretary of Health and Human Services,

27 *Defendants.*

28 Case No. 2:25-cv-255-JNW

29 **DECLARATION OF HARRY H.  
30 SCHNEIDER, JR., IN SUPPORT OF  
31 PLAINTIFFS' MOTION FOR CLASS  
32 CERTIFICATION**

33 Harry H. Schneider, Jr., declares, pursuant to 28 U.S.C. § 1746, as follows:

34 1. I am one of the attorneys representing plaintiffs in this case. I have personal  
35 knowledge of the facts set forth in this Declaration and I am competent to testify. I respectfully  
36 submit this declaration in support of Plaintiffs' Motion for Class Certification.

37 2. I graduated from The University of Chicago Law School in 1979. I was admitted  
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39 SCHNEIDER DECL. ISO MOTION  
40 FOR CLASS CERT.  
41 (2:25-cv-255-JNW)

42 Perkins Coie LLP  
43 1201 Third Avenue, Suite 4900  
44 Seattle, Washington 98101-3099  
45 Phone: +1.206.359.8000  
46 Fax: +1.206.359.9000

1 to practice in Washington in the October of 1979, have practiced in Washington continuously since  
 2 that time, and am an active member in good standing of the Washington State Bar Association.

3       3. I am admitted to practice in the United States District Courts for the Western  
 4 District of Washington, the Eastern District of Washington, the United States Court of Appeals for  
 5 the Ninth Circuit, and the United States Supreme Court. I have also been admitted *pro hac vice* in  
 6 various other state and federal courts in jurisdictions outside of Washington including Oregon,  
 7 Alaska, California, New York, New Hampshire, Arizona, Massachusetts, New Jersey, Nevada,  
 8 Wisconsin, and Montana.

9       4. I was an associate attorney at Perkins Coie from September 1979-1985, and I have  
 10 been a partner of the firm since January 1, 1986. At all times I have practiced in the general  
 11 litigation practice group at Perkins Coie engaged in a variety of state and federal court litigation. I  
 12 have represented both individuals and businesses, and I have had ample trial experience over the  
 13 past 45 years.

14       5. I am a member of several professional organizations, and have received some  
 15 professional recognition, including: Fellow, American College of Trial Lawyers; Member,  
 16 International Society of Barristers and former Board Member and President, now serving on the  
 17 Nominating Committee of the Board of Trustees; Member, Board of Directors of Attorneys'  
 18 Liability Assurance Society, Inc., and former Chairman of the Board; Member, International  
 19 Academy of Trial Lawyers; listed in Benchmark Litigation Guide to America's Leading Litigation  
 20 Firms and Attorneys; Best Lawyers "Lawyer of the Year" for Bet-the-Company Litigation, State  
 21 of Washington (2016); listed, Chambers USA, "America's Leading Litigation Lawyers; listed,  
 22 Chambers USA, The Client's Guide; recipient, Washington State Bar Association Award of Merit  
 23 (2011); recipient, Federal Bar Association for the Western District of Washington, President's  
 24 Award (2008); Lawyer Representative, Ninth Circuit Judicial Conference (2008-10); Member,  
 25 Board of Directors, The Washington Courts Historical Society; former President, King County  
 26 Bar Foundation; former President, King County Bar Association; former Chairman, ABA

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1 Standing Committee on Lawyers Professional Liability; and recipient of the American Inns of  
 2 Court Professionalism Award for the Ninth Circuit (2009).

3       6. I am familiar with the procedural aspects and requirements of class action litigation,  
 4 and I have served as counsel for plaintiffs in many civil cases in state and federal court, including  
 5 this Court.

6       7. I have represented a class in this district of thousands of individuals who had their  
 7 applications for naturalization or adjustment of status halted, delayed or denied by the Controlled  
 8 Application Review and Resolution Program. *See Wagafe v. Trump*, No. C17-0094-RAJ, 2017  
 9 WL 2671254, at \*15 (W.D. Wash. June 21, 2017) (finding that “Perkins Coie [ ] ha[s] the  
 10 experience and ability to vigorously and adequately represent the class”). My experience in class  
 11 action cases also includes serving as defense counsel in the Boeing Securities Litigation before  
 12 Judge Zilly in the late 1990s.

13       8. The attorneys of record at Perkins Coie also have extensive experience litigating  
 14 class actions throughout this country. Some of these cases include:

- 15       • Pro bono counsel representing all children who are or will be in the Arizona foster care  
 16 system, asserting due process claims. *See B.K. et al. v. Snyder*, Nos. 17-17501, 2:15-  
 17 cv-00185;
- 18       • Pro bono trial and appellate counsel for class of prisoners in Arizona Department of  
 19 Corrections, challenging the class’s constitutional access to the courts. *See Gluth v.*  
 20 *Kangas, et. al.* No. 84-cv-1626; and
- 21       • Trial counsel for defendant hospitals in alleged price-fixing class action and lead  
 22 counsel for defendants in opposing interlocutory appeal from partial denial of class  
 23 certification.. *See Johnson, et al. v. Arizona Hospital and Healthcare Association, et*  
 24 *al.*, No. 07-cv-1292.

9. Perkins Coie's litigation group has many decades of pro bono class action experience, successfully representing members of the public in nationwide class actions in this district and throughout the country.

10. Perkins Coie attorneys, paralegals, and legal assistants have spent countless hours preparing this litigation and prosecuting this matter to date. Since filing this lawsuit, in the space of a month Perkins Coie, along with IRAP attorneys, have filed two motions for preliminary injunctive relief and a motion for an emergency hearing, in addition to representing Plaintiffs at two court hearings. The attorneys of record at Perkins Coie and our paralegals have spent significant hours on this case including conducting legal research, drafting briefs and declarations, preparing oral argument, communicating with plaintiffs, and investigating constantly changing factual matters in this case. Perkins Coie is committed to continuing to devote significant resources to vigorously litigate this case on behalf of the entire Class.

I declare under penalty of perjury that the foregoing is true and correct.

Executed at Seattle, Washington on March 14, 2025

s/ Harry H. Schneider, Jr.  
Harry H. Schneider, Jr., WSBA No. 9404

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